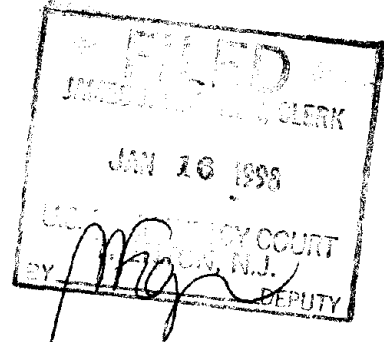


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Attorneys for Gary S. Jacobson, Trustee



In re

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

CAROLYN V. SCHNOOR

Case No: 97-51892/SAS  
Chapter 7A  
The Honorable Stephen A. Stripp  
Hearing Date: February 9, 1998

Debtor

TRUSTEE'S NOTICE OF MOTION FOR ORDER STRIKING EXEMPTION

SIRS/MADAM:

PLEASE TAKE NOTICE, that the undersigned in his capacity as counsel for Gary S. Jacobson, the Chapter 7 Trustee of the bankruptcy estate of the above-captioned Debtor(s), shall move before the Honorable Stephen A. Stripp, United States Bankruptcy Judge at the United States Bankruptcy Court located at 402 East State Street, Trenton, New Jersey 08607, on February 9, 1998, at <sup>9:00</sup>~~10:00~~ am or as soon thereafter as counsel may be heard, seeking the entry of an Order striking the exemption listed at Schedule C, "Property Claimed Exempt", of the Debtor's Petition, and consisting of an "auto accident claim".

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the application submitted in support of the within motion, together with oral argument on the return date hereof, should the

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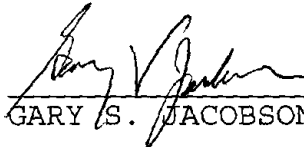
Court deem same necessary.

PLEASE TAKE FURTHER NOTICE, that you need not appear unless you oppose or contest the relief requested. Any responsive pleadings shall be filed and served with the Clerk of the United States Bankruptcy Court, at the above address, with copies served upon the undersigned. All responsive pleadings shall be governed by the provisions of Local Rule 9013-3.

PLEASE TAKE FURTHER NOTICE, that the undersigned specifically waives oral argument unless oral argument is required by the Court.

PLEASE TAKE FURTHER NOTICE, that no brief is necessary because there are no complex or novel issues of law or fact involved.

Dated: January 15, 1998

  
GARY S. JACOBSON, Trustee

CERTIFICATION OF SERVICE

I certify that on January 15, 1998, I served upon those parties listed on the attached service list, via regular mail, the foregoing Notice of Motion For Order Striking Exemption, Certification of Gary S. Jacobson in support of the Motion, and proposed form of Order.

Dated: January 15, 1998

Marie Ellis  
Marie Ellis

SERVICE LIST

United States Trustee  
One Newark Center - Suite 2100  
Newark, NJ 07102

Charlotte Engleman, Esq.  
Engleman, Hoffman & Engleman  
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GARY S. JACOBSON

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ROBERT H. CRESPI  
JAMES S. FRIEDMAN  
SUSAN L. GORDON

January 12, 1998

Clerk, US Bankruptcy Court  
402 East State Street  
Trenton, New Jersey 08608

Re: Carolyn V. Schnoor  
Case No: 97-51892

Dear Madam/Sir:

I am enclosing originals and two copies of Notice of Motion for Order Striking Exemption.

Kindly return a stamped "filed" copy of the Order to me in the envelope provided for that purpose.

Please contact me if you should have any questions..

Sincerely,

*Marie Ellis*

Marie Ellis  
Legal Assistant to  
Gary S. Jacobson, Trustee  
ME/s

